

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, DC 20554**

**In the Matter of**

**Joint Application by BellSouth Corporation,  
BellSouth Telecommunications, Inc., and  
BellSouth Long Distance, Inc. for Provision  
of In-Region, InterLATA Services in  
Georgia and Louisiana**

**CC Docket No. 02-35**

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**COMMENTS OF THE LOUISIANA PUBLIC SERVICE COMMISSION**

The Louisiana Public Service Commission submits the following comments in support of the application of BellSouth Telecommunications, Inc. ("BellSouth") to provide interLATA service in Louisiana. The Louisiana Commission incorporates by reference and reasserts all of its comments filed in CC Docket No. 01-277, including the Evaluation of the Louisiana Public Service Commission filed October 19, 2001 ("Evaluation") and the Reply Comments of the Louisiana Public Service Commission filed November 13, 2001 ("Reply Comments"). The additional comments provided herein will address the Louisiana Commission's continuing efforts to promote competition in the local service market.

**I. Competition in Louisiana's Local Service Market is Growing.**

By Order No. U-24714-A dated September 21, 2001, the Louisiana Commission established updated cost-based rates for the unbundled network elements ("UNEs") and

combinations of elements that BellSouth is required to offer. *See* Evaluation, pp. 6-8; Exhibit 3. These ordered rates have caused Competitive Local Exchange Companies (“CLECs”) operating in Louisiana to expand their reach into the local market for both business and residential customers. Cox Louisiana Telcom, LLC and Advanced Tel., Inc. (“Eatel”) have announced expansions into the local residential markets. *See* February 8, 2002 Times Picayune Article, attached hereto as Exhibit “A.” These recent events confirm that the UNE rates established by this Commission are appropriate and that the local markets are indeed open to competition.

## **II. The Commission continues its efforts in Docket U-22252-C.**

The Staff of the Louisiana Commission, with the assistance of Acadian Consulting Group, has continued its efforts in Docket U-22252-C to address issues concerning BellSouth’s service quality performance measures and the associated self-executing penalties. In LPSC Order No. U-22252-E, dated September 21, 2001, the Commission directed Staff to develop penalties in Docket No. 22252-C to ensure that fully parsed CSR functionality and the single-C ordering process were implemented on schedule. *See* LPSC Order No. U-22252-E, dated September 21, 2001, attached to the Evaluation as Exhibit 5, pp. 4-5.

Subsequently, the Staff received comments from all interested parties on these issues in Docket U-22252-C and proposed a recommendation that was ultimately adopted by the Commission during its December Business and Executive Meeting. *See* Order No. U-22252-Subdocket C-2, dated February 21, 2002, attached hereto as Exhibit “B.” This order establishes stiff self-executing penalties if the processes are not implemented as scheduled.

In addition, the Staff conducted further technical workshops in Docket No. U-22252-C on January 9-10, 2002. A copy of the agenda published for these workshops, together with the matrix of open issues pending in the workshop is attached as Exhibits “C” and “D,” respectively. Further technical workshops are presently scheduled for March 13-14, 2002.

### **III. The Commission Has Held Additional Collaborative Workshops.**

The Louisiana Commission held its seventh CLEC Collaborative Workshop on February 8, 2002 in order to permit CLECs and BellSouth an opportunity to resolve informally any operational issues that continue to exist. Prior to this workshop, parties were invited to submit their issues in writing and provide specific examples where possible to allow BellSouth to investigate. During the February 8<sup>th</sup> workshop, the parties discussed their issues and BellSouth has recently submitted the results of its investigations to the Staff for its review. A copy of the Notice, Agenda and Open Issues Matrix that were used during the February 8<sup>th</sup> Workshop are attached hereto as Exhibits “E,” “F,” and “G” respectively.

### **IV. Other Proceedings Conducted by the Louisiana Commission.**

In addition to the above-described proceedings, the Louisiana Commission is also reviewing the SGAT revisions submitted by BellSouth in response to the FCC’s August 8, 2001 release of its Fourth Report and Order in CC Docket No. 98-147 (*In the Matter of Deployment of Wireline Services Offering Advanced Telecommunications Capability*). Specifically, BellSouth filed SGAT revisions to permit CLECs to cross connect collocated equipment and to specify the types of equipment that BellSouth would permit to be collocated. The Commission instituted Docket No. U-26011 to permit any

interested party to intervene and participate in this review. This review is being conducted by the Commission's Administrative Hearings Division, which has received comments from all interested parties and presently has the matter under advisement.

**V. Conclusion.**

The Louisiana Public Service Commission remains committed to ensuring that our local telecommunications market is fully open to competition. BellSouth has complied with the orders issued by this Commission to implement the requirements of the Telecommunications Act of 1996, as well as the regulations issued by the FCC there under. For these reasons, the Louisiana Commission respectfully requests that the FCC grant BellSouth's application to provide interLATA service in Louisiana.

Respectfully submitted,  
**LPSC LEGAL DIVISION**

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